

U.S. Department of Justice

United States Attorney
Southern District of New York



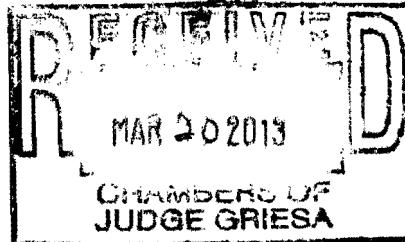
USDC SDNY
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DATE FILED: March 20, 2013

By Hand

Hon. Thomas P. Griesa
United States District Judge
United States Courthouse
500 Pearl Street, Room 1630
New York, NY 10007-1312

86 Chambers Street
New York, New York 10007

March 19, 2013



Re: Dunahoo v. FBI,
13 Civ. 514 (TPG)

MEMO ENDORSED

Dear Judge Griesa:

I write respectfully to request a forty-five day extension of time, from March 29, 2013 to May 13, 2013, to respond to the complaint in the above-referenced civil action. This is the Government's first request for an extension of time.

This is a complaint in which plaintiff, who is appearing pro se, claims that the "FBI had a fiduciary duty to protect Plaintiff but instead, violated, breached, compromised, and failed to protect and implement 18 U.S.C. § 3771, rights for federal crime victims as it relates to Plaintiff." I have reviewed the complaint, and I intend to file a motion to dismiss. Accordingly, I request a forty-five day extension to allow the Government sufficient time to research the issues and file a dispositive motion or, in the alternative, an answer to the complaint. I have attempted to contact Plaintiff to obtain his consent to this request but have been unable to reach him.

I thank the Court for its consideration of this request.

Respectfully,

*Approved:
Thomas P. Griesa
JGW
3/20/13*

PREET BHARARA
United States Attorney for the
Southern District of New York

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cc: By Federal Express
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